

# **EXHIBIT A**



Nicole Harrington



BACKGROUND

GIMMIES

CVS  
FAILURES



## BACKGROUND

### RESPONSIBILITIES

- EDUCATE OTHERS re:  
"REGULATORY COMPLIANCE ISSUES"
- PRESENTATIONS  
"influential in negotiating  
reduced civil penalties and  
mitigating extensive compliance  
agreements"
- PRIMARILY RESPONSIBLE FOR  
MITIGATING REGULATORY RISK  
in critical parts of CVS's  
pharmacy business

TRUE  
OR  
FALSE

### EXPERIENCE

"LIFER"

- +27 YEARS AT CVS
- 1994 Graduate pharm. school
- 2012 DIRECTOR OF PHARMACY  
PROFESSIONAL PRACTICE STANDARDS
  - A NEW DEPT. & POSITION
- 2016 SENIOR DIR. of PHARMACY  
Professional Services



GIMMIES

## THE OPIOID EPIDEMIC

- You repeatedly post on the "opioid epidemic"
- <sup>CVS</sup> ~~Your~~ group makes presentations on the "opioid epidemic"
- Epidemics don't happen overnight <sup>N. Harrington doesn't understand it.</sup>  
SPECIFICALLY REGARDING OPIOIDS

## "CORRESPONDING RESPONSIBILITY"

- THIS IS A KEY PHRASE FOR OPIOID DISPENSERS
- PHARMACISTS ARE THE LAST LINE OF DEFENSE BETWEEN ILLEGITIMATE PRESCRIPTIONS AND OUR COMMUNITY  
N. Harrington "NO"  
Document draft says yes  
Training material says yes  
N. Harrington says yes 2016

## RED FLAGS

- A PHARMACIST MUST IDENTIFY IF THE OPIOID PRESCRIPTION HAS BEEN ISSUED FOR A LEGITIMATE PURPOSE <sup>Doc tells "all pharmacists" TRUE</sup>  
N. Harrington → DISAGREE
- REFUSE TO FILL A PRESCRIPTION WHICH HAS RED FLAGS PRESENT THAT CANNOT BE RESOLVED  
AGREED
- ALL CONTROLLED SUBSTANCE PRESCRIPTIONS MUST BE REVIEWED FOR THE PRESENCE OF RED FLAGS  
AGREED
- ALL RED FLAGS MUST BE RESOLVED & DOCUMENTED PRIOR TO FILLING THE PRESCRIPTION  
AGREED
- IF ANY RED FLAGS ARE UNABLE TO BE RESOLVED, A PHARMACIST MUST REFUSE TO FILL THE PRESCRIPTION  
Agreed

## TOOLS

- Training <sup>CVS</sup> TRUE: Co. training  
School training  
Personal training
- PMP's "Prescription Monitoring Program"  
STATE DATABASE w/ Rx fulfillment info.
- Many more

1  
KNOW  
ILLEG.

2  
SUSPECT  
ILLEG.

3  
KNOW  
Legit.





## CVS FAILURES

IT WOULD BE NAIVE TO THINK THAT  
CVS DID ALL IT COULD TO REDUCE THE  
GROWTH OF THIS TRAGIC PROBLEM  
N. Harrington disagrees

### CVS & PURDUE



WERE HAND-IN-HAND  
ON OPIOID ISSUES  
AS EARLY AS 2001

BE READY AT TRIAL  
PLEASE

### CVS GOT CAUGHT REPEATEDLY

~~2010-15~~ Florida failure  
2012 Holiday case  
2011-13 Oklahoma case  
2012-14 Texas case  
2013-15 Mass. case  
2010-15 Rhode Island  
2013-15 Texas case  
2008-12-16 Maryland case  
2011-16 Mass. case  
2016 Conn. case  
2017 California case  
2018 Alabama case  
2018 N.Y. case  
2019 Rhode Island case

### FAILURE BEHAVIORS

TILL 2012 Incentive plans  
based on pills including  
opioids  
TILL 2013 "wait time"  
calculations included  
opiates